

COMPLAINT FORM

(for filers who are prisoners without lawyers)

(revised 10/10/2022)

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF INDIANA POLTS

FILED

04/01/2025

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Kristine L. Seufert, Clerk

Autumn E. Cordellione a.k.a.)
(Full name of plaintiff(s)))

Jonathan C. Richardson)
)

v.

Cause No. 1:25-cv-00632-RLY-TAB

(to be supplied by clerk of court)

Donald J. Trump Individual)
(Full name of defendant(s)) Capacity)

Mr. Thompson Individual)
Capacity)

Ms. Gase Individual Capacity)

Jane Doe Individual Capacity)

Director of Classification Individual)
Capacity)

A. PARTIES

1. Plaintiff is a citizen of Indiana, and is located at

(State)

NCCF P.O. Box A, Moultrie Castle, IN 47362

(Address of prison or jail)

(If more than one plaintiff is filing, list address on another piece of paper)

2. Defendant Donald J. Trump

(Name)

Is (if a person or private corporation) a citizen of Washington, D.C.

(State, if known)

SCANNED

1.

and (if a person) resides at The White House, 1600 Pennsylvania Ave
 (Address, if known) North West, Washington, DC
 and (if the defendant harmed you while performing defendant's job) worked for 20500

(Employer's name and address if known)

(If you need to list more defendants, use another page)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know

All the defendants violated the plaintiff's 8th amendment
- Failure to supervise/protect, Indiana Tort Law - Gross Negligence

On January 28th 2025, the Plaintiff Autumn E.
Cordellione a.k.a. Jonathan C. Richardson was transferred from
New Castle Correctional Facility the Annex (NCN) where she
had been housed on protective custody, too Westville Correctional
Facility Level 1-B facility (WCA). A facility with no security
cameras, with no doors on the cells, understaffed, and populated
with mostly gang affiliated prisoners who traffic with Correctional
staff in the form of Drugs, sex, and money. The facility is known
for its high level of offender on offender assaults and is rife
with drugs.

The Director of Classification at central office, knowingly
sent plaintiff who is transgender, has been assaulted for being transgender,

has been assaulted (stabbed) for refusing sex with another offender, has a high profile criminal and civil case that have recently been broadcast across multiple national and local news media outlets in which they reported on her criminal history and transgender status, name, as well as her civil case's preliminary injunction for gender affirming surgery.

while housed at (WCA), the plaintiff was assaulted and raped multiple times over a four day period by 12 gang affiliated offenders; From January 28th, 29th, 30th, and 31st; 2025.

On ~~From~~ January 29th, while plaintiff was being raped by 3 of her assailants, she "begged them to stop and asked them why are you doing this to me?" to which her assailants replied while laughing at her, "We saw your shit on FOX, and Trump was talking about you fagass, dicksucking trannies, he said your messing up our kids in school with your sex change shit... Trumps president now and we won't ever get in trouble for fucking you trannies up, we're patriots and even if you tell us, trump will pardon us and probably give us a medal."

The plaintiff was told numerous times by her assailants, "that if she 'switched' on them to staff, that they would know, cause the staff are on their payroll and they would kill her."

Plaintiff tried to report the assaults and rapes on January 29th, 2025 to the unit team manager Mr. Thompson, who responded, "I've seen your case on the news, and I personally don't think us taxpayers should have to pay for your surgery. God doesn't approve of transgenders and gays,

So what do you expect to happen, when you dress like a woman and have tits in a male facility."

The plaintiff tried to report the assaults and rapes on January 29th, 2025 to an officer working on her dorm whom she refers to as "Jane Doe". "Jane Doe" responded: "That she couldn't help and it's not her problem, and if plaintiff pushed the issue then she would tell the plaintiff's assailants that she tried to "Switch" them out."

Plaintiff on January 29th, 2025 saw "Jane Doe" hand a drug package to one of her assailants, later in the day.

The plaintiff tried to report the assaults and rapes on January 30th or 31st 2025 to her Case Manager Ms. Gose, who responded, "You're that trans that was a lawsuit, and now we hard working taxpayers have to foot the bill, well there are only two sexes, male and female and God made you a man, Trump's putting a stop to all that gay shit... I can't help you, you report what you saw."

Plaintiff directly and specifically told Defendants Mr. Gose, Mr. Thompson, and "Jane Doe" that she had and was currently being assaulted and raped by multiple gang affiliated offenders in her dorm, on the above dates.

All Defendants violated Indiana Tort Law, with their gross negligence and ~~wanton~~ disregard of the plaintiff's safety.

All Defendants violated the plaintiff's 14th Amendment - discriminating against the plaintiff due to her transgender status.

All the Defendants actions in this cause were motivated and propagated due to their religious and political values and hatreds.

The Defendant Donald J. Trump has on numerous occasions both as president and ~~as~~ ^{as} former president spoken about his extremist rhetoric and transphobic hate speech. He has voiced his prejudices at rallies, on national media news outlets (FOX, CNN, etc...), and social media platforms (X, Truth, etc...). These actions have emboldened the Defendants, and the assailants that brutally assaulted and raped plaintiff, not once, but multiple times to act on their hate and ~~pre~~ prejudices, constituting the cause in action and his liability in this case.

The Defendant Donald J. Trump's words were a motivating factor in the Defendants actions concerning the plaintiff's safety. His negligence is rooted in his knowledge that others may act on his words and the plaintiff suffered ~~a~~ violence ~~th~~ because of this. This violated her 14th Amendment - True Threats.

The plaintiff has grieved these issues (See Attached Grievances Ex. A) Exhausting her administrative Remedies.

A. PARTIES CONT.

3. Defendant Mr. Thompson is a citizen of Indiana and resides at ^{Westville} ~~Westville~~ Correctional Facility, 5501 South 1100 West, Westville, IN 46391

4. Defendant Ms. Gose is a citizen of Indiana and resides at Westville Correctional Facility, 5501 South 1100 West, Westville, IN 46391

5. Defendant "Jane Doe" is a citizen of Indiana and resides at Westville Correctional Facility, 5501 South 1100 West, Westville, IN 46391

6. Defendant, The Director of Classification for Indiana Department of Corrections is a citizen of Indiana and resides at Central Office 302 W. Washington St. Room E-334 Indianapolis, IN 46202

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331, and Supplemental Jurisdiction under Section 28 USC § 1367(a).
OR

☐ I AM SUING UNDER STATE LAW. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or any order telling defendants to do something or stop doing something.

Compensatory Damages in the amount of 3.5 million Dollars,
Punitive Damages in an amount to be determined by a jury.
For Pain and suffering, emotional, mental, physical Distress. As well
as any other relief the court deems necessary or appropriate.
Transfer to a female Institution, Injunction (Permanent)
as well as a preliminary Injunction for the same as plaintiff is still
suffering and likely to suffer continued harms.

E. JURY DEMAND

☒ Jury Demand – I want a jury to hear my case

OR

☐ Court Trial – I want a judge to hear my case

Dated this 27th day of April ~~March~~, 2025

Respectfully Submitted,


Signature of Plaintiff

127630
Plaintiff's Prison ID Number

NCCF P.O. Box A
Plaintiff's Mailing Address

New Castle, IN 47362

(If more than one Plaintiff, use an additional piece of paper)

F. CERTIFICATION (Optional)

Under penalty of perjury, I declare that the facts alleged in this complaint are true and correct to the best of my knowledge and belief.


Signature of Plaintiff

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEE

- ☒ I DO request that I be allowed to file this complaint without paying the filing fee. I Have completed a request to proceed in the district court without prepaying the fee and attached it to this complaint.
- ☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing Fee under 28 U.S.C. § 1915 and I have included the full filing fee with this complaint.



Exhibit
A

Return or Receipt of Grievance

Offender Name: JONATHAN
RICHARDSON
DOC#: 127630

Facility: Westville Correctional
Facility
Bldg/Bed: WCA R1-W 1

Case #: 25-203805

Stage 1 Complaint

Type: Return or Receipt of Grievance
Date Received: 02/18/2025 12:34 PM
Response Author: Shannon Smith
Responded On: 02/18/2025 12:34:57 PM
Decision: Stage 1 Response

Case Details

Case Number: 25-203805

Grievance Status: Open

Case Data

Unit of Complaint: Westville Correctional Facility
Opened Date: 02/18/2025 12:34 PM
Grievance Category: Affirmative Action

Grievance Stage: Stage 1 Submitted

Stage 1 Grievance Response

Grievance Date: 01/28/2025 12:00:00 AM
Response Due: 03/11/2025 12:34 PM
Response: Logged

Issue: PREA Concern
Responder: Shannon Smith

☐ Unprocessed

Officer's Name: Smith, Shannon NMI

Notice: If the notice refers to return, then the offender has five (5) workdays from receipt of the above response to resubmit their corrected grievance. If the notice refers to receipt of an accepted grievance the offender will receive a response within fifteen (15) workdays.



OFFENDER GRIEVANCE

State Form 45471 (R5 / 3-20)
DEPARTMENT OF CORRECTION

RECEIVED

FEB 14 2025

FOR OFFICIAL USE ONLY

Grievance number

26-203805

To: Facility Grievance Specialist	Facility NCF	Date (month, day, year) 2-8-2025
From (name of offender) Jonathan Richardson	DOC number 127630	Signature of offender
Housing assignment M1-206B	Date of Incident (month, day, year) 1-28 thru 31-2025	
<p>Provide a brief, clear statement of your complaint or concern. Include any information that may assist staff in responding to your grievance. (NOTE: A Single ONE-sided sheet of paper may be attached if necessary to explain your grievance.)</p> <p>On 2-28-25, I was transferred to WCA [Level 1-R] and was raped and assaulted by 12 offenders over the course of 3 days [from 1/28/25-1/31/25]. I had notified my Case Manager Ms. Gose and Mr. Thompson on 1/29 or 30/25 about the assaults and rapes and they failed to protect me and I even notified staff on the dorm about the assaults and was ignored; I don't know the staff names, but she work on 1/29 or 30/25. I eventually found an officer on 1/31/25 who finally got me help. The dorm I was sent to had no cameras and was understaffed, I was brutally raped because of these staffs negligence and should of never been transferred to that facility, where I was left unprotected and a Target for assault as I'm transgender.</p>		
State the relief that you are seeking. 3.5 Million,		
Signature of Facility Grievance Specialist 		Date (month, day, year) 2-18-25



Warden or Designee Appeal Response Notice

Offender Name: JONATHAN
RICHARDSON

DOC#: 127630

Facility: Westville Correctional
Facility

Bldg/Bed: NCF, NCN M-M1, 206B

Case #: 25-203805

Formal Grievance

Type: Formal Response

Date Received: 02/18/2025 12:34:00 PM

Response Author: Shannon Smith

Responded On: 02/18/2025 03:48:28 PM

Decision: Resolved

Case Details

Case Number: 25-203805

Grievance Status: Not Resolved

Case Data

Unit of Complaint: Westville Correctional Facility

Opened Date: 02/18/2025 12:34:00 PM

Grievance Category: Affirmative Action

Grievance Stage: Warden or Designee Appeal Responded

Warden or Designee Appeal Response

Responder Name: Cristina Duncan

Date/Time: 02/18/2025 03:48:28 PM

Due Date: 03/11/2025 03:48:08 PM

Result: Uphold

Response: Appeal has been reviewed. The facility level one response is appropriate. Your claims cannot be substantiated by this office and were sent to the office of investigations for further review. The grievance process doesn't provide the monetary relief that you have requested in your appeal.

☐ Override

☐ Data Input Error

☐ Unprocessed

☐ Extension

Restitution Recommended: No

Notice: You may elect to appeal the decision of the Warden or Warden Designee to the Grievance Manager (form 45473 Grievance Appeal) within five (5) workdays from receipt of the above response to the Grievance Specialist by

•Ensuring the grievance procedure within their assigned unit and institution has been exhausted.

•Please select an option below and sign/date

☐ Agree

☐ Disagree



GRIEVANCE APPEAL
State Form 6003 (RS/4-17)
DEPARTMENT OF CORRECTION
OFFENDER GRIEVANCE PROGRAM

Case 1:25-cv-00652-RLY-TAB Document 1 Filed 04/01/25 Page 12 of 13 PageID #: 12

RECEIVED
FEB 24 2025

Grievance log number
25-703805

Date form sent to offender (month, day, year) 2-14-2025	Date of grievance (month, day, year) 2-8-2025	
Name of offender Jonathan Brinkley	DOC number 127630	Facility where the correctional facility
Housing assignment NCD-M1-201	Date grievance response received (month, day, year) 2-18-2025	

Facility level appeal:

The investigation should be thorough. It is and
charges should be pressed against my assailants and I still
request monetary relief, and staff should be punished.

Signature of offender

[Signature]

Date signed (month, day, year)

2-18-25

Facility level response:

Response in Delta

Signature of warden / designee

[Signature]

Date signed (month, day, year)

2/6/2025

Please check the appropriate box and return this form to the Facility Grievance Specialist.

☐ Agree with facility appeal response.

☒ Disagree with facility appeal response. Send appeal to Department Offender Grievance Manager.

Signature of offender

[Signature]

Date signed (month, day, year)

3-9-2025

DISTRIBUTION: Copy – Facility Grievance Specialist; Copy – Department Grievance Manager; Copy – Offender Packet, Facility; Copy – Offender

New Castle Correctional Facility

CERTIFIED TRUST FUND ACCOUNT STATEMENT

Name: Richardson, Jonathan D.O.C. Number: 127630
Location: M1-206 B NCF Arrival Date: 2/4/25

I hereby certify that this statement and the attached document(s) accurately reflect the Trust Fund Account activity of the above Incarcerated Individual from 9/20/24 to 3/19/25; a six (6) month time period, unless the time period the Incarcerated Individual has been confined at the New Castle Correctional Facility is less than six (6) months.

Incarcerated Individual's current Trust Fund Account balance. \$ 12.57
Incarcerated Individual's average monthly deposits. \$ 203.50
Incarcerated Individual's average monthly balance. \$ 45.43

Date: 3/21/25

Signature of Authorized Official: Violet Lom

Printed Name and Job Title: Violet Lom
Library Assist.
New Castle Correctional Facility